

C .UNITED STATES DISTRICT COURTHOUSE FOR THE
SOUTHERN DISTRICT OF NEW YORK CIVIL COURTS

KEITH S.MORRIS,

Plaintiff,

COMPLAINT FOR PRICE &
DAMAGES

-Against-

Pres.DONALD J.TRUMP; A.L.J. ROXANNE FULLER;
A.G., WILLIAM BARR; COMM. ANDREW SAUL OF SOCIAL
SECURITY; NANCY BERRYHILL , DEP.COMM. OF SOCIAL
SECURITY; and UNITED STATES OF AMERICA (GOV).;
As well as , LORELEI SALAS ; COMM. OF DCA ; ALLISON
JOHNSON , DEPARTMENT OF CONSUMER AFFAIRS , ;
TRACIE L. COVEY ; ED. of UNEMPLOYMENT INSURANCE
APPEALS BOARD NYS ; GERALDINE A. REILLY , CHAIR
WOMAN (NYS UIAB) ; DEPARTMENT OF LABOR ; SECRETARY
OF STATE (N.Y.) , MIKE POMPEO ; ; STEVEN MNUCHIN; REX TILLERSON ; OFFICE OF
TEMPORARY DISABILITY ASSISTANCE (OTDA) , ALEXANDER ACOSTA , D.O.L.
SECRETARY , et-al .

Defendants.

VENUE

JURISDICTION

12 usc 1811; 12 usc 1787 (k)(3); 119 Stat 3605; 42 USC sect.1983; 1981;and 2000e; 28 USC
Section 1343;1331;1333; 46 USC sect. 121;15 USC sect. 77(e)(b)(2); 28 USC sect.2462; Public
Health Law section 74 (a); 28 USC sect. 1441 ; 35 USC section 154 (a); 35 USC section 271 (a)
Model Penal Code section 242 .

1. Plaintiff, KEITH MORRIS, is suing the above defendants in their official capacity , as well as,
Each officer in their individual capacity. Plaintiff is suing under U.S. Section 1983 a Civil Rights
Law passed by congress that provides a legal remedy for consumers who have been deprived
Of Their Constitutional & Statutory rights, under color of State law.

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2. Defendants demonstrated conduct violated clearly established Constitutional & Statutory Rights of plaintiff to wit, it's clearly established that administrative law judges, are justice of the Peace, and required by section 36-19-24, N.M.S.A.1953, to make monthly remittance of all fines & Costs imposed & forfeitures collected in regards of Ms.ROXANNE FULLER ; and Ms. OLUWATO AKINROLABU , May 20th,2019, and November 5th & 25th,2020, 9:30 am, by way Of phone.

3. Defendants, ROXANNE FULLER, in failing to make the monthly maintenance fee intentionally Chose to commit a known breach of duty & the debt created was result of Ms.Fuller's Defalcation, and the proximate & deliberate cause of the within action. Defendants shared a Partnership with the hearing officer , which creates a conflict of interest adverse to defendants.

4. Plaintiff requests this Court award the plaintiff nominal damages of the rights & interest here, So violated in the amount of one dollar.

5. Plaintiff allege facts that defendants OLUWATO, FULLER as representative agents of the United States Government and accord with the Act , Fiduciary capacity can betray their duties With entire success, despite the commission for the purchase or sale of judgment rendered on May 20th,2019, and November 25th,2020 (phone-call), and in violation of the antitrust act.

6. Andrew Saul & Nancy Berryhill failed to afford the plaintiff access to the Court's by failing to Afford plaintiff an enforceable remedy by law without delay, Failing to give plaintiff notice of Concealed dangers hidden in plain sight, and defendant's absence an unexplained reasons for Not being present and seen as a casual connection between the administrative law judge & Defendants Saul & Berryhill. American institutions ought to be built from truth & trust for all.

7. Defendants acts or omissions depict a painted picture & implies that at present the plaintiff is Insured & protected as a consumer, and survivor of defendant's deceptive unfair trade practices That flies uncheck; to wit: " public policy dictates to Citizens shall not be subject to unlawful Detention, or arrest of property possession against public policy, which is subjecting individual Plaintiffs to explosive units within the unfit conditions of the unsafe vocational hearing, which is Unavoidable because defendants failure to place a claimant / plaintiff on notice of the within Concealed traps within plainsight of the premise utilized for the theft of a plaintiff's personal Belongings for the enrichment of defendants; however, the exclusion of plaintiff at expense of the Plaintiff , but the benefit of defendant's, despite, defendant's as affluent management officials Knew or should have known that officials in such vicarious positions as the within, officials Needed to be properly train, as well as, preventive safety practices, such as rules & instruction Manuals, and procedural requisites.

8. Plaintiff were not given no instructions on how to challenge defendant's conduct with regard to Individuals Berryhill & Saul conduct in violation of Article iii of the federal Constitution; however, Plaintiff reallege the wrongful Fourth Amendment violation of the unlawful withholding of the

Plaintiff's disability benefits, unemployment insurance transition benefits, representation fees, Costs of completion, cost of substitute goods & the original contract price. U.C.C. section 2-712.

9. Plaintiff is not precluded from subsequently filing the within claim for damages on the grounds That Justice Roxanne Fuller & Oluwato didn't have the power to award relief sought by this Plaintiff, moreover, plaintiff requests that this court appoint special conversion enforcement Agents to address the illegal conversion of personal property while on the premises is a failure To practice safety measures.

10. Plaintiff clearly reserved the plaintiff's right to review an adverse audit by either Nancy Berryhill , or defendant Andrew Saul concerning business financial reports which are relevant & Pertinent to the execution of claim, the director's clearly was given notice when plaintiff had Produced the requisite disabled report of doctor Mc Nir. Which were deliberately ignored , or Intentionally overlooked by the hearing officer, acting under color of law of United States. Plaintiff Has exhausted all in house remedies available or afforded the plaintiff, after defendants breach.

11. Defendant's conduct & actions of delay is directed at frustrating the plaintiff , aggravating the Plaintiff, and humiliating the plaintiff in any way to disregard the plaintiff's established right to be Heard by jury trial & set his own price for his time, intelligence, and labor.

12. Plaintiff seek loss earnings resulting in defendant's disenfranchisement resulting from the Defendants, or their agents for the improper denial & renewal of the plaintiff's New York State Towing licenses (NOT FINISHED) not fin...%\$#@*&

13. Plaintiff herein request the relevancy of the par value of the stock being sold or purchased With the Federal Securities law of 1930's which required disclosure of financial information of a Corporation to a potential investor; if not, it leaves room for social security to scam individual Claimants by offering goods for less than full lawful recovery. Plaintiff requests this fact be Considered rendering judgement.

14. Plaintiff states that he is allowed interest from the day defendants withheld payment of Disability Benefits because of the shared contract between plaintiff & the defendants, which Defendants breached , and failed to protect the plaintiff from a known harm that the defendants Were completely aware of by the design of the defendants platform on which defendants Distributed goods & the way upon which they were delivered on the defendant's premises, Which subverts insurance & proper coverage for damages through improper licences &

Certificates of occupancy , Department of Buildings management office & control . U.C.C.
Section 2-714 / 715.1`

15. Defendants co-conspirators, principal's , and known agents could have retreated ,rather Than, employ the self defense, and injure the plaintiff. Defendants employed cheating, and Trickery as a tool to unlawfully obtain possession , and a advantage of plaintiff retirement plan Benefits, which is not recognized by the defendants reckless disregard for the plaintiff's rights, Which are protected as a consumer because plaintiff do not enjoy an arms length bargaining Position with Respect to the businessmen with whom they deal, therefore shouldn't be restricted By flawed Legal rules for damages & recovery of damages.

16. Plaintiff requested the amount of 18,000.00 representation fees & labor for the plaintiff's time & Energy invested in the research for the quintessence of truth within the matter at hand. Plaintiff Had to effect three within appeals at the rate of 6,000.00 each appeal, not to exclude per stirpes.

17. Plaintiff stockholder voting rights include controlling interests, public & private interests, on Corporate , administrative procedures & policy changes federal & state laws (NOT FINISHED)

18. Defendants practice of illegally poll taxing the plaintiff for voicing his right to be heard not Only discriminate against the plaintiff in violation of the Fourteenth Amendment to the U.S. Const But also hinders the plaintiff from executing this claim because plaintiff can't afford commission Fees for the specific performance of defendants rendering a decision advantageous to the Defendants own culpable conduct , as well as, discriminate against a certain class of individuals From which the plaintiff has been accustomed to being associated with in the past, to wit: the Identity of ex-convicts / felons, or people that has been incarcerated for which the plaintiff is Being capitated at a fix amount because plaintiff has been projected as a untrustworthy person On the Record by the defendants from plaintiff's criminal past.

19. Defendants Nancy Berryhill & Andrew Saul knew about the devised system which plaintiff Had no way of avoiding, except , not to conform to the prerequisites of vocational hearing Invitations by failing to show; however, plaintiff were threatened , not to show is incentive for Denying the plaintiff's claim, so plaintiff was forced to attend, with the threat of being denied Benefits for relief of struggling to survive.

20. Defendants and their principal agents devised & practice a scheme built upon intellect , and Capitalizing on the unintelligence of the individuals that such purchasing agents come into contact With , such as, using descriptions the plaintiff wouldn't understand, as well as, not

Providing explicit & unambiguous explanations , and misleading on the plaintiff's strategy to
Defend the plaintiff's complaint.

21. The unlawful confiscation of the plaintiff property on the 20th day of may 2019 for the second
Time denying the plaintiff relief in this matter was not only offensive, but assault & battery with
The willful intention to cause plaintiff harm, which is why the plaintiff is before this Court now.

22. On the 13th day of January 2020, plaintiff received a call from Social Security (203)
706-1993; then on the 14th day of January 2020, the plaintiff received another phone call from
Marsh McLennon (Risk Strategy insurance company)at approximately 1:30 pm, and 16 days
Later plaintiff received another call on the 30th day of January 2020, then on the 6th day of
March 2020, plaintiff received a call from pasadena realty (Real estate company).

23. Moreover , Plaintiff felt threatened that individual security firms were contacting plaintiff
Directly, and plaintiff hardly knew or shopped with individual defendants, yet alone, voluntarily
gave his Contact information , which were probably targeted by the more elaborate broker firms,
Or Insurance houses because of the context of plaintiff's complaint, and the shared risk of
Defendants & big insurance houses that have the authority as acting under color of state law.

24. Then on the 7th of November 2019, at 11:00 am someone presumed to be KYLE WILLIAMS
Special drug enforcement (Federal agents); shield number # US25493; and phone no.# listed
As (915) 320-0120 ext.205 ; accompanied by federal agent WALTER SCOTT; Shield No.# listed
As US11910; and three other individuals describe as Department of Homeland Security ; and
Chief Social Security officer, as well as, officer CK231462; Plaintiff received a second call at
2:18 pm the same day; whereas, plaintiff spoke with individual agents in regards to 20 pounds of
Control substance cocaine, and told ,a stolen car , to wit : corolla toyota (2013) Plate No.# Tx.
7334; located at 5731 Chromo drive, El Paso , Texas 79912. Moreover , Plaintiffs were accused
By theses officers of smuggling 200,000.00 dollars from Columbia to Texas.

25. Plaintiff automatically assumed that this was in retaliation for plaintiff's litigation concerning
The within usury complaint concerning the plaintiff's retirement plan benefits, as well as , Social
Security benefits.

26. The Seventh Amendment to the United States Constitution guarantees the plaintiff's right to
Trial by Jury in any civil case before a Federal Court, if the amount exceeds 20.00. Here , the
Initial claims were approximately 1,200.00 dollars/month ; however, plaintiff requests this court
Settle the disputes for a Nominal fee \$ 100.00 dollar.

27. Defendants failure to disclose the number of tons burden a ship or vessel will carry, as Estimated by the official measurement & computation prescribed by public authority defendants Failure to disclose this information is arbitrary & capricious; whereas, it discriminate & prejudice The plaintiff an opportunity to prove the element of each crime that defendants committed.

28. President Trump publicly denounced the Consumer Finance Protection Bureau, which Coincidental is the place of enforcing plaintiff's claimed rights, which Mr. Trump policy & procedures, Customs , administrative rules & regulations violate plaintiff's liberty interest, property & peace Of mind.

29. President Trump's conduct implies that the Consumer Financial Protection Bureau is only a Smoke screen of fluffy clouds, and enforcement is not possible because the agency is tainted , And dead, such as , a tombstone ad. This was a stunt , public announcement concerning such Agency products of liability, for which the threat to dismantle were uttered .

30. Ex.President.Trump specifically stated on national T.V. " there's an invisible being trying to Attack our democracy " ; he was talking about his silver bullet pointed directly at the lawmakers Of congress, which them intentions were carried out, well that threat were acted out on Jan. 6th 2021, Not only were this coincidental , but the firing of Richard Cordaray (CFPB) director, had Signified the actual assault that we the people learned to be an attack on our very own Lawmakers , and an act to overrun the government , and be totally immune from prosecution Because he's the " BOSS " . and shielded from accountability .

31. Defendant's Trump; Saul ; and Berryhill played a role in impounding plaintiff's benefits Because of the defective goods which should have been given to the plaintiff upon the Submission of the plaintiff's application for benefits in or about sometime of June 2017.

32. Defendant Trump threatening the plaintiff through mere agents, or principals acting in concert With defendant Trump to fabricate charges against the plaintiff in order to settle this case would Be acting unethical in a professional capacity, and subverting the criminal process, and deter Plaintiff from his legal rights, and diminish the public trust & confidence in the legal system Because it's been abused by defendants consecutively.

33. Plaintiff is not certified by the law to conduct substantive legal tasks required for the Continuity & execution of this case without supervision of an attorney at law appointed by this Court for the effective and unhampered delay of completion .Pennsylvania Bar Assn.formal Opinion # 98-75, 1998 WL 988168 . NYCRR section 1200.36 (Mc Kinney's 2000) .

34. Plaintiff pursues defendants criminal liability because there appears to be explicit factual Evidence directed at the defendants " improper intent " and abuse of civil process. Arising from The same nucleus of facts; plaintiff re-allege the factual statement that requiring evidence of Improper intent before finding a violation of the rule of vocational hearings reduces the misuse Of the disciplinary process by unscrupulous defendants seeking an tactical advantage over wary plaintiffs like the within claimant .

35. Defendants acting in concert with principle agents aggravated plaintiff pursuant to section 240.30 penal code 1 (a)(b)(3)(4); 530.11 ; 240.25 by way of calling plaintiff house to induce fear .

36. Failure of public officers Saul ; Berryhill acting under color of law & responsible for carrying Out the payments or approval of payments, as well as , due care regarding the plaintiff's Physical handicap failed to provide plaintiff with the bare minimum of a sitting chair during the Entire hearing, and didn't consider offering the plaintiff to have a seat, despite, there were Nowhere to seat except the magistrate's chair & the stenographer's seat .

37. Although quarantine is distinct from plaintiff's dower in regards to possession of benefits ; Quarantine is an incident of dower . Plaintiff right to cause of action can't be alienated nor the Plaintiff's interest . Statutes conferring the right of dower are substitutes for the common law Right of quarantine .

38. Plaintiff requests the exigency of this Court Immediate intervention because plaintiff is Without means of income to survive or pay bills , to wit: student loan ; car insurance ; phone; Rent, as well as , parking tickets. Therefore, plaintiff needs his benefits immediately & without Unnecessary delay, which defendants designs & conduct make clear from their demonstrated Conduct and actions .

39. Plaintiff detrimental reliance upon the hearing officer to protect plaintiff's interests throughout The trial hearing process is well established under the due process of law pertaining to the Records that are owned, by each principle agents, acting on behalf of the within defendants, And dispose or lose such contents , violates the First Amendment , because plaintiff was not Entitled to recover monetary damages absent a showing of actual malice .

40. Plaintiff requests this Court's special consideration concerning defendant's disclaimer of Liability ; Therefore, the existing parent company of Social Security Administration should be Held responsible for their subsidy company's lack of control over their tenants . Which is an

Actionable offense against defendants insurance carriers, which were not disclosed & Considered as destroyed evidence by defendants or their principal agents.

41. Defendant's conduct pertaining to individual defendant Andrew Saul; Pres,Donald J. Trump; And Nancy A. Berryhill whom in their capacity as president, commissioners' knew or should Have known that, rebating is a form of price discrimination practice , which is unfair, and if Proven by plaintiff is actionable , and the amount of damages \$ 200,100,000.00 for the act of splitting insurance risks with co-conspirators who are principal agents for the defense. Model Act.

42. Plaintiff state & alleges that hearing officer Roxanne Fuller acting in concert with Nancy Berryhill, and Andrew Saul induced the sale of security benefits of the plaintiff to a known Creditor for the purpose of inflicting severe financial harm to plaintiff for overdraft fees, late fees, Insurance premiums,etc.. However, all directed at injuring the plaintiff's credit score, or Defaulting on a loan.

43. Defendants conduct were designed intentionally to cheat, subvert the Security Exchange Commission restrictions by private placement orders , as well as , direct placement orders ; These sophisticated tactics are utilized by the within defendants and their principal agents to Undermine the market value, by replacing market value with defendants personal negotiations, Which violates the sherman act; clayton act; and unfair deceptive trade practice act. Actionable.

44. The probability of a jury finding the within defendants guilty for direct property exposure is Highly likely being that defendants demonstrated actions & conduct pivots the delay & Destruction of evidence, specifically , the recorded record , via commission administrative Hearings. By way of defendant's personally contracting with private contractors, which hold Hearings & license to do so . Acting under color of law

45. For the purpose of deliberately seeking an advantage of the plaintiff , defendants withheld Relevant incriminating evidence during the discovery stage, which would have help the plaintiff Validating the facts from the plaintiff's perspective, and would have conveyed a totally different Outcome for the plaintiff , and would not be so confusing in the determinations, which seems to Leave a claimant speculating as to what's going on in the prosecution of the plaintiff's complaint . To wit : The requested Brady & Brady Alerts for the within defendants per se & per quod which On allegations of false statements may be actionable on a claim for special damages.

46. Issuance of social security administration obligation bonds violate the equal protection of the Fourteenth Amendment, article XI, section 18 by incurring liability exceeding the 2020 year with

Out the 2/3 needed to do so. By according some votes greater effect than others dilute voting Power, and the election to remedy relief in the complaint by choice of plaintiff.

47. Defendants named above committed fraud upon the Court by their ignorance & blind eye of The truths of reality, in real time at 26 federal plaza where defendants acting in concert with Principal agents solicited the plaintiff for personal property & interests that the defendants themselves know are unjust to plaintiff, and suits to benefit the defendants, without regard for plaintiff interests such as social security benefits.

48. Defendant Trump pressured the plaintiff through his aggressive policies which stripped the Plaintiff of certain privacy rights & interests without plaintiff's consent including copyrights for The plaintiff work product, and the litigation goods of the plaintiff which are protected.

49. Ex.pres. Donald J. Trump had the power & authority to change the policies that inflicted Harm to plaintiff, despite the fact that defendant trump was made aware through communication Of grievances & litigation regarding the nondisclosure of public information which is not to be Kept secret concerning public interests.

50. Plaintiff bring this petition for damages resulting in 60 (b) ; two different outcomes from the Factual evidence, and with this Court's instruction the confusion could be ironed out, moving Plaintiff forward in life & closer to the truth in this matter resolved without notice, or the plaintiff's Permission / consent for the unauthorized settlement in agreement with the plaintiff . Which in Fact, requires this Court to reverse / modify / and reopen previous judgments in accord with Unauthorized settlement & Fed Law. Defendants express conduct implies a hijacking of the Plaintiff's bullet-points concept for the defendants enrichment, in disregard of the plaintiff's ideas And contributions to the change of laws.

51. Plaintiff requested that the Court hold defendants in contempt of Court & modify defendants Purchase sale of record on May 20th, 2019, for the conflicting interest that Andrew Saul, Comm. Of Social Security Administration; as well as, Nancy Berryhill, Ex.Comm of S.S.A. aided & Abetted ; as well as, acting in concert to forfeit the plaintiff's cause of action in manner not Permitted by federal law , to wit : settling the plaintiff's claim without the plaintiff's permission Violated the plaintiff's due process of law .

52. Plaintiff request that this Court take into consideration covid-19 pandemic for any delay that Would have cause the plaintiff to over extend the one year rule considering the extra-ordinary Circumstances of the covid pandemic, which shut down everything including the United States Court, with that in mind, plaintiff is within the one year statute of limitations to introduce plaintiff's Claim for slander of title.

53. Defendants conspiring together with other principal agents in their scheme plotted to cheat Plaintiff of fair market value , by way of, interfering with dominion over the plaintiff's Property, And claiming plaintiff's personal property as their (defendants) own, as a result of the Defendants (Trump; Saul ; and Berryhill) conduct, plaintiff has suffer loss of income & the sale Of a potential buyer for the within defective goods that defendants named above were all Cospiring to cast doubt on ownership of title in a plot to cheat plaintiff out of what rightfully Belongs to plaintiff, and maliciously discourage potential buyers interested in the plaintiff's work Product.

54. On the 25th day of November,2020, Defendants conspired with the Department of Labor to Purchase the sale & recordings of the plaintiff's work products causing special damages to the Plaintiff for preventing the purchase & sale of this replacement value , on an interest of value not Circulated yet, but is the product & contribution of plaintiff's work product.

55. Plaintiff petition this Court to find defendants liable for slander of title by falsely declaring ones Mind to injury of this plaintiff is actionable, the concealed fraud demonstrated & carried out , by The defendants & their agents is admitted by the demurrer. They defendants named above did Not file an answer denying the charge of concealed fraud & damage to plaintiff's reputation Through libel & slander (NOT FINISHED)

56. Plaintiff damages are the resulting implications of the law & its operation, and that trust from The nature of plaintiff & defendants transaction that should plaintiff work and pay taxes, (state Policy)the intent of the bargain agreed for were, should plaintiff get injured or disabled, the Plaintiff would be compensated with disability benefits, which also , entitles plaintiff to the Temporary transfer assistance to unemployment assistance that plaintiff never received, Pandemic assistance, and plaintiff's monthly benefits, which is being withheld because of the Distribution defect on the plaintiff's property, as a result of the defendants defective products, to Wit : Social Security benefits.

57. Defendant's conduct has a negative impact on the criminal justice system because its Seeks to conceal pivotal & relevant incriminating evidence that would otherwise have a gross Negligence effect, as opposed to a negligence effect. Here the defendant's conduct implies , or Seems to imply the unethical practice of provisions; such as, plaintiff may not say nothing bad About the within defendants (no different than a gag order) , not excluding the public information & The media press., which intentionally & deliberately interfere with the plaintiff's First Amendment right (Defamation / slander of title / libel).

58. Not only is defendants cheaters , liars , & thieves by taking advantage of individual claimants That do not know , unintelligent , poor , and unrepresented via council , but defendants utilize Ingenuity , which had plaintiff forward defendants a notice , which frankly , wasn't their business But for furthering the defendants plott to be abreast of the within litigation in order to destroy Pivotal evidence of defendant's guilt .

59. It's the plaintiff's belief that purpose of settling this case in absence of the plaintiff's is to Exclude , or discourage individual claimants in the same boat as Mr. Morris , seeking an Attorney with the ability & resources to be effective before this Court, not a lay person with only The basic academic diploma in liberal arts, not the legal arena where resistance is futile to the Lay plaintiff .

60. The secret settlement conditions place restrictions on the plaintiff's right to share such Contents with similar claimants in violation of Rule 5.6 ; California Civil Code section 1542 . Especially , when there's a public policy / interest involved .

61. Plaintiff hope that defendants refrain from using objectionable language, which is offensive & Unethical . Rule 8.4 (a); 3.4 (f) . November 25th, 2020 ; and May 20th,2019 defendants & their Principal co-conspirators had a duty to protect the interests of the incompetent plaintiff, which Ms. Fuller failed to do so by demonstrating supervision .

62. The named defendants acting in concert with others, which can't be identified at present Because of the defendants deliberate and reckless disregard for public record discovery, which Defendants pass off as irrelevant & incriminating, defendants committed open court contempt And should be held accountable .

63. Defendants ingenious scheme were devised of a " bait & switch " consumer deception Practice the within named defendants utilized to gain an advantage of plaintiff & individuals claim Ants with like issues. Here, once plaintiff executed his application for disability benefits , Defendants berryhill , Barr , and Trump conspired through their interests , standing , and political Views enticed plaintiff to help defendants commit a crime , by pressuring the plaintiff to attend The hearing on the 20th of May, 2019 , so defendants conspiring with the independent contractor Could swindle plaintiff for his benefits in exchange for nothing or a lessor benefit , robbing plaintiff Of property value with no gun , only the license to do so .

64. Ex. President D.J. Trump either knew and pretended not to be informed of the latent defects And latent ambiguity in the language and interpretations ; which in the plaintiff's perspective, an Any reasonable person can only come to the plaintiff's conclusion, should plaintiff be granted

The opportunity to present such facts & evidence before a jury for defendant's product liability Which injured the plaintiff, Keith S. Morris , through the administration , procedural process, and The denial of a fair hearing due to the fault of defendants product, which plaintiff owed no duty to Inherent defects, impression, for which defendants tried to steal the rights to the plaintiff's Sequence of arrangements .

65. Plaintiff's sequence of events , which fails to be of importance, or worthy of protection, that Defendants failed to protect the material variations to enhance defendants concealment of Infringing upon the plaintiff , using piracy. Not to mention, changing variations , shifts liability; Which defendants are in charge of controlling through its power .

66. Pandemic unemployment insurance law is violative with the facts that it delays postponing Time for performance , impose conditions not in the agreement , or what was bargained for ; Moreover , when a case (like here) have equitable causes & legal cause of action , plaintiff is Entitled by the Seventh Amendment of the United States Constitution to have a jury decide the Legal issues .

67. Defendant's deduction from the facts already admitted , and proven, whether the defendants Act , or do not act, does not exculpate liability, and for such , plaintiff is entitled to retroactivity on The facts of the new and reconstructed " STANDING ENACTED DEFENSE " , Jan. 10th Gov. Cuomo NYC .

68. The unskilled handling of the plaintiff hearing (May 20th, 2019, & Nov. 25th, 2020), and the Relationship shared between the hearing officer's and the plaintiff, presumes an interest of duty Owed the plaintiff, considering the circumstances on how that duty is owed /

69. Plaintiff claims the defendant's defective goods (social security) , injured the plaintiff Causing severe gross negligence, and reckless disregard for the plaintiff's substantial rights, Fed. rules of crim. P. 52 (b) .

70. Defendants committed reversible irregularity where defendants intent were never polled to The jury , via , written instructions, verbatim , by way of the Judge , or electronic digital data .

71. Plaintiff, Keith S. Morris , states that the above defendants conspired with the named Defendants to guard in a plot against guilt, based on affiliation , and members of a certain goal & Interest adverse to the that of the plaintiff. Each defendant knew about the scheme , as well as , Each player's role to advance the purpose of the conspiracy.

72. Plaintiff's declaration of the trial / vocational hearing Judge charged with the transfer of Interest & property rights of the herein plaintiff ; to the defendants for reason unbeknownst to Plaintiff, with the exception other than to prosecute the co-conspirators & agents .

73. The willful delay of prosecution on the merits encourage the continuing conduct of the Defendants malpractice encouraging intentional infringement of a patent near its expiration date, Causing the plaintiff irreparable damages by way of conspiring to shorten plaintiff's patent effective life

74. Defendants concede nothing in the text of the Patent Act expressly prevent plaintiff (The Patentee) from demanding compensation from each downstream user , or reseller of an article Embodying plaintiff's invention. The right to exclude 1952 Statute (1) Making without selling or Using ; (2)Using without making or selling ; or (3) selling without making or using .

75. On the 14th day of March, 2021 , plaintiff would have lost a great deal of money within the Unemployment insurance benefits , from the first injury , which inflicted assault & battery, by The defendant Nancy A.Berryhill by withholding the plaintiff's property benefits for no fault of this Plaintiff , other than, the inherent defect of the defendants defective goods . As a result of this Wrong , Plaintiff will be terminated March 14th, 2021 , unless this Court compels the defendants To release the plaintiff's benefits, which are related to other property interests . Unless this Court Intervene plaintiff would lose payment from , on or about June / July 2017 until present, plus, Pandemic unemployment relief money, plus, the temporary transfer assistance disability Benefits .

76. Defendants principal agents acting on the above defendants behalf , stop claiming plaintiff's Benefits on plaintiff's original unemployment insurance claim as of the 21th day of March, 2021, And the cut off date for the original bargaining agreement begins March 14th and definitely ends April 5th, 2021 , As of March 21, 2021 , unemployment insurance claims divisions has implied That the plaintiff has exhausted his original claim ; however , the defendants' debt remains unpaid on the first claim, and to file a new claim , would forfeit the plaintiff's retrospective benefits And the reason for the plaintiff's motion to compel .

77. Defendant's original agreement which was bargained for was set at 600.00 dollars ; Thereafter , 400.00 dollars, and last , but not part of the agreement , last minute 300.00 dollars. Plaintiff object to the loss of this 300.00 dollars that would decrease the plaintiff's damages via 300.00 Dollars.

78. On or about May 23 , 2017 , plaintiff received notification from one Neda Cho of the Depart. Of consumer affairs, regarding the plaintiff's denied application to renew the plaintiff's towing License , application license number # 6835-2017. Without the plaintiff towing license it was very Difficult to maintain a steady income , as well as , made it almost impossible to have Unrestricted Work . License is the prerequisite to towing in NYC .

79. Although the defendants & their acting agents denied the plaintiff the right to participate in Their towing program , defendants & their agents acted with wilful intent to harm plaintiff & his Towing business ; thereafter , impeding the plaintiff's New York State's inspection license on or About the 19th of March , 2021 . All are essential ingredients to maintain income & operate Driven vehicles , and the plaintiff's livelihood .

80. Defendants have manufactured new reconstructed law pertaining to pandemic Unemployment insurance assistance program , which were enacted in part to the Plaintiff's Complaint for disability unemployment benefits ; although the plaintiff's claim existed before the New changes of law , the previous statutes & provisions for the change laws should be applied , Because to manufacture laws unconstitutional to the plaintiff's rights would be unconstitutional .

81. Defendants and their agents have not returned plaintiff's fingerprinting fee ; nor plaintiff's Renewal fee , from then Oct 31st,2016,to date . (\$ 20.00). Defendants actions damage the Plaintiff's business reputation , via , slandering the plaintiff because he had served time & were a Felon ; via , accusing the plaintiff of credit card fraud , with the intent to defraud his customer's Damaged the plaintiff's business , where as projected clients would be reluctant to utilize the Service of an alleged & accused thief .

82. Defendants & their agents wrongfully levy taxes on the plaintiff's business affairs accusing Plaintiff of owing the internal revenue affairs , and selling plaintiff's debt to friendly creditors , with The intent to cheat the plaintiff ; via , giving plaintiff's creditor's extra money .

83. Plaintiff states that the defendant discharged the legal duty owed the plaintiff because of the Defective product distribution of the defendant's liability for issuing defective goods .

84. Plaintiff states that the defendants & their principal agents joint venture in risk sharing ; as Well as time sharing , which is the gist of the privacy violation for which plaintiff brings his Complaint .

85. Plaintiff has been prejudiced in a way ; whereas , plaintiff is restricted to piece meal proof Because of the panoply of evidence which were deprived the plaintiff to offer as indisputable Facts , and graphic evidence , changing the outcome of the case .

86. Defendants and their principal agents actions created negative publicity which impacted the Plaintiff's business performance ruining the plaintiff's business , and substantially hurting his Reputation as a respectable businessman .

87. Defendants and their principal agents sought for two years to confiscate the plaintiff's driver Licenses ; towing licenses , and New York State inspection licenses . Defendants led a Smearing campaign against plaintiff , as well as , the plaintiff's 35,000. Per year business & Earnt income of approximately 1500.00 Per week .; as well as, approximately 1500 every 3mth To the irs .

88. Defendant's principal agents placed false information upon the plaintiff's 35,000.00 annually Towing business " Paladino Cash Tow Rescue, Inc. " ; via , associating the plaintiff place of Business with credit card fraud because plaintiff served time in prison , and wrongfully accusing The plaintiff of , or implying , stealing customers credit identification because the plaintiff served Time is damaging , and causes a negative impact whereas individuals clients are reluctant to do Business with the plaintiff . Defendants disclosure of private litigated facts , to public disclosure Without the consent of the plaintiff , and should have been protected as a privacy right .

89. Plaintiff have reason to believe that his legal work product has been plagiarized while the Contents of his complaint were idley awaiting the return to normalcy after the pandemic , the Work product of plaintiff's lied dormant in the Attorney General's office for approximately two Days before plaintiff's injunction were granted , and months before like impressions surfaced With facebook & google & twitter .

90. The gist of plaintiff's complaint is brought for the wrongful monopoly the Social Security's Office conducted with their unclear , ambiguous manner since injurious misrepresentations Constitute fraud , such as, defendants vocational hearing after the granting of a disability letter.

91. Ex president trump as commander in chief of the United States failed to protect the public at Large , and plaintiff within the defendants territory from the bare minimum protection within Defendants institution , i.e., Social Security Administration " Vocational Hearing " .

92. Defendant Andrew Saul, the commissioner of Social Security Administration, was aware of The expected dangers within his institution or should have been aware of the preventive dangers Within his agency , as the commissioner in charge of Social Security.

93. Approximately 4 years ago when Nancy A. Berryhill were the acting commissioner Ms. Berryhill had the acting authority to ensure her agency { social security } coordination across all Federal agencies such as social security responsible for the public welfare, and a range of other Natural disaster risk, that would otherwise harm it's citizens if preventive measures are not Taken in advance .

94. Defendants exposed plaintiff to foreseeable dangers that could have been prevented Had Defendants landlord took the minimum steps of ensuring that defendants utilized the premises For which the premise were rented / leased , and plaintiff states that since defendants landlord Or the unknown owner of the building & it's insurance carrier did not ensure defendants had the Proper coverage for the business that defendants were conducting ; then , the owner of the Building should pay plaintiff for the pain & suffering that was intentionally inflicted upon the Plaintiff .

95. Plaintiffs have an undisclosed amount of debt that defendants are responsible For , by charging late fees , causing the plaintiff to default intentionally on loans & credit that were Within defendants transition of power . Plaintiff's last known amount owed was \$ 11,000.

96. Defendants discriminated against the plaintiff who defendants knew were disabled but failed To do anything to assist him at the vocational hearing , when they knew there was a danger to Be expected , nor could defendants protect the plaintiff from the foreseeable hazard that awaited Plaintiff .

97. Defendants conspired with the Department of labor ; Social Security Administration ;Welfare ; And the Unemployment insurance agency deprives the plaintiff of the sequence of events which Tends to alter liability for defendants failure to provide the plaintiff with benefits, or issuance of Defective goods .

98. Defendants & principal agents conspired with the department of consumer affairs to Confiscate the plaintiff's towing license , department of consumer affairs harassed the plaintiff Several times concerning license privilege investigations , defendants intimidated the plaintiff With the threat of losing his towing license , and coerced plaintiff to DCA hearings that pried to Into the plaintiff's private life & business .

99. Defendants and their principal agents adamantly make the futile objection that the public Services of each individual government agency , could be divorced / or separated from the Proper function of a democratic government ; this the plaintiff claims is impossible if in the Constitution of the United States government is to protect it citizens from crucial & unusual

Punishment .

100. Defendants & their principal agents concealed the gist of their scheme through ingenious Ways that camouflage the defendants true intent , i.e., the suppression of legal representation For valid claims that would otherwise succeed with representation , that otherwise fail without Legal counsel because the plaintiff is financially disadvantaged. Defendants failed to provide Disclosure that defendants are responsible for providing counsel for benefits for which the Plaintiff already paid taxes. Nevertheless , plaintiff states that claimant's are to seek & obtain Their own counsel , when it's the defendant's obligation to provide effective assistance , and not The plaintiff's whom the defendant's so artfully shifts the burden .

101. Plaintiff respectfully requested that this Court Compel the insurance carrier of the defendant Social Security Administration on the 20th day of May , 2019 , located at 26 Federal plaza , NYC.As well as the owner of the building , the insurance contract shared between the Defendants & the owner of the property located at 26 Federal Plaza , New York City 10007.

102. Plaintiff compel this Court for the hearing magistrate contract , or the independent Contractor's agreement between the social security agency & the contracting agent of record For the purchase sale on May 20th, 2019 , and the independent contractor's agreement of the Hearing held on the 25th of November , 2020 . before { A.L.J.} Ms.OLUWATO AKINROLABU , Via phone - call .

103. Defendants failure to act ; or its deliberate intent to ignore ; to protect the privacy rights of The plaintiff not yet before or fully exposed to the public, defendants knew or had reason to Believe that had defendants or their agents intervened / obstructed in the justice practice defend Ants would not have been able to reach the conclusion the hearing officer reached , considering, The plaintiff's disability letter. Defendants had reason to believe should they not consider plaintiff Letter defendants could deny the plaintiff's claim , causing severe impact to injury .

104. Defendants actions were in no way beneficial or profitable to society or the population at Large because it failed to protect its citizens as a prerequisite to government governing capacity, Defendants inaction is futile & is not an option for the protection of society & civil obedience . Government's obligation is to serve & protect its citizens for the paid tax protection .

105. Donald J. Trump scandalously announced the sale / purchase of " Consumer Finance Protection Bureau " in Forbes ; June 30th, 2020 , defendant trump mimicked the public Announcement " in plain sight " that the defendant intended to misrepresent to the people of the Public, which defendants are meant to serve and protect, not abuse . However , because of the Defendant's action which implied , retaliation & dismantlement of the { DFPB } because the

Avenue plaintiff had to travel . Defendants made the plaintiff suffer with pain every turn , or just to Move forward .

106. Defendants & principal agents obstructed justice by way of influencing the decision making Process ; via , of paying the hearing officer a commission fee for the record purchase , and the Discharge of the hearing judges' duties , which included a decision in favor of the plaintiff's pain & Suffering , and a decision adverse to the hearing officer's conflict of interest against the weight Of the evidence . Especially , since the hearing officer received a gratuity to perform the specific Service complain of in this suit , and which plaintiff request that this Court intervene on the Plaintiff's behalf ; now , since to date , defendants obligation goes unperformed , and plaintiff Request that this Court compel defendants to perform their obligated duties rather than the Obstruction of governmental administration the defendants have conducted for the past 4 years.

107. Defendants Barr ; Saul ; Berryhill ; and Trump along with other unknown principal Coconspirators knew about the hazardous traps within the interior of the vocational hearing , And failed to take measures to prevent harm as a safety prevention mechanism ; however , Defendants named above knew of the traps ; hidden dangers (in plain sight) ; such as , hired Licenses to revoke , in return for a commission fee , (the commission fee which plaintiff Respectfully request this Court compel as proof of amount paid Ms. Fuller , or anything given Ms. Fuller of value in return for conducting her service May 20th, 2019 , at 26 federal plaza NYC. 10007 . Model Penal Code section 242 .

108. Defendants named above knew of the felony that was committed daily on an everyday Basis violating individual applicants by way of stripping applicants of their rights to effective Counsel , and concealing the fact that defendant's are too pay the attorney's fee ; not allowing Potential applicants of their rights too challenge the conduct ; via , standing . Defendants failed To inform plaintiff of this strategic defense upon informing plaintiff of his rights to appeal ; more Over , the above named defendants failed to disclose the facts to the public , as acting officials . Have no active agreement outside of the defendants contractual agreement F.I.C.A.

109. Defendants shared a silent risk with individual co-conspirators to place applicants at a Disadvantage , without a fair chance too bite the apple . Defendants have as of yet , informed The public, what defendants have allowed ; although , defendant Trump has delivered a distorted Version of events , by way of , publishing the Forbes stone ad .The true facts have been mis- Represented to the public , and to further misrepresent the facts to the public defendant Donald Trump dismantled the elected remedy plaintiff had the option to execute his complaint DFPB . Which the plaintiff implied as intimidating & a form of retaliation for bringing this suit , and should Be considered a continuing act, in need of an protection order from this Courthouse .

110. Plaintiff respectfully request a reversal modification of judgment & the opinion explained in Layman terms so the plaintiff can understand judgement because it has yet to be explained to The plaintiff ; how the defendants were able to magically circumvent defendants impermissible Interference with the jury selection function , which violates the plaintiff's right to due process ; to Wit : the hearing officer's commission fee . (conflicting interests) .

111. Not only has the plaintiff's prize possession shows the impression of the new revived Privacy rights , that were exploited & robbed of the monopoly of plaintiff's production works . Undermining the plaintiff's worth & belittling the plaintiff's creation .

112. Plaintiff compel defendants and their agents for tending to disappear for questioning , and Leave the question unanswered ; why social security administration always commit the Disappearing act during the vocational hearing , and never has to answer to the hearing that is being conducted in the absence of the defendants , i.e., like a trusted official is in charge of Defendant's (social security admin.) acting authority , and were implied to be such by the Plaintiff .

113. The working group comprised of representatives from ten cabinet departments & 3 other Agencies engaged in the collection or use of federal race & ethnicity data for purpose of transparency & civil enforcement of federal programs such as social security program , failed to Comprise this discriminating information since 1997 , which may have prevented the bias Approach the defendants choose to distort the relationship shared between the plaintiff & the Risk , exposure to liability , selective discrimination , and the defendants systematic bias need To be considered .

114. The internal validity of a study depends greatly on the extent to which biases have been Accounted for and necessary steps taken to diminish their impact ; plaintiff states bias as the Primary reason & conflicting interests on behalf of defendants resulted in the plaintiff's Conclusion . True association between exposure & outcome .

115. Confounding factors here mask / conceal defendant's intent & association for the failure to Disclose the insurance company responsible for the payment of the breach upon the premises ; Which falsely but truly imply defendants affiliation with its insurer for some unknown interest of Value which ort to be considered .

116. Representation is but one confounding factor within the plaintiff's complaint which Unbalance the scale as a disadvantage to the plaintiff in an intellectual debate of the mind & the Casual nexus which link between treatment & the outcome , unless appropriate methods of Supervision by this Courthouse are adjusted for the effect of confounding variables .

117. Defendants & their agents unequal distribution of social security benefits between Treatment groups , such as , ex-cons ; homeless ; and mentally ill , discriminates against the Plaintiff and possess abstract value , in defendants' inaction / bias to act on behalf of plaintiff ; Defendants inaction & abandonment of an obligated duty to uphold the law whether in the Interest of defendants , or the plaintiff , defendants owed plaintiff a duty to act in the best Interests of the plaintiff without being unfair .

118. Although defendants failed to act , defendants do not deny the relationship between the Cost & plaintiff's benefits (value) .

119. Plaintiff reiterates should the land or property ordered sold should bring in less than the Juries settled judgment , in absence of the plaintiff , plaintiff requests this Court's request for Permission to pursue the difference in the jury amount .

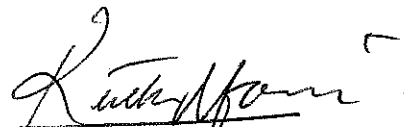
120. Citation by publication ; DFPB ; Forbes June 30, 2020 ; via , Kelly A. Smith ; BBC news ; November 30th, 2021 ; plaintiff states & reallege that defendants conspired to deny , deprive , Plaintiff of personal privacy rights .

121. Defendant's acts are not only offensive but are biased in that they prejudice the plaintiff With respect to the evidence ; which defendants failed to disclose , and the plaintiff's requests to Compel have gone unheard , plaintiff case will be compromised by way of the record , and not Via panoply of evidence . Which is the defendants strategic way of delaying & losing information That is incriminating to the defendants innocents. Here , appeal is direct & collateral .

122. Defendants that are no longer in office should be service by way of public citation ; via , Newspaper selected by this Court to be circulated publicly ; to wit : W. Barr , A.G. ; M. Pompeo A. Acosta ; Donald J. Trump ; principal co-conspirator's that had personal involvement , or Information that sharpens the ensight of what's being exploited .

123. Respondents acting in concert with the Department of Labor ; Office of Temporary Disability ; Unemployment Insurance ; Department of Consumer Affairs : Social Security Administration ; and unknown others conspired & collaborated with unknown principal agents Acting to restrict the plaintiff's appeal by laches , statute of limitations , duress , coercion ; mis-Representation ; fraud ; impaired the plaintiff's credit & business reputation .

124. Respondent's deliberately & intentionally unjustifiably restrained the plaintiff from enjoyment Of benefits & interests shared by defendants , the plaintiff in turn feel isolated , secluded , and Trapped because of respondents meddling with the plaintiff's free will to mingle with whom the Plaintiff may .


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